REMARKS

Claims 40 - 78 are pending. Claims 1 - 39 have been cancelled. Claims 40 - 78 have been added. No new matter has been introduced. Reexamination and reconsideration of the application are respectfully requested.

In the May 7, 2003 Office Action, the Examiner rejected claims 1 - 39 and 34 - 39 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,546,572 to Seto et al. (the Seto reference). The Examiner rejected claims 1 - 39 under 35 U.S.C. § 103(a) as being unpatentable over the Seto reference. These rejections are respectfully traversed in so far as applicable to the presently presented claims.

The specification, specifically the title of the invention, has been amended to more accurately reflect the nature of the invention.

The present invention is directed to a method, system, and program for the retrieval of a retrieval object including an impression having a closest similarity with an impression or a retrieval word from among a plurality of retrieval objects. A method for generating a retrieval object map includes pre-storing an expression word map, in which a plurality of expression words on a virtual space are arranged depending upon a degree of association of the impressions. A plurality of retrieval objects corresponding to said expression words are pre-stored. A position is derived of at least one expression word corresponding to each said retrieval object. If a plurality of expression words corresponds to a retrieval object, the position is derived in one of two manners. First, if a distance between coordinates of said plurality of expression words is less than or equal to a predetermined distance, average coordinates of the coordinates of said plurality of expression words are taken as coordinates of a position of a single

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expression word corresponding to said retrieval object. If the distance is greater than a predetermined distance, respective coordinates of said plurality of expression words are taken as the position of the at least one expression word. A retrieval object map arranging said respective retrieval objects on said virtual space based on the derived position.

Independent claim 40 recites:

A method for generating a retrieval object map, said method comprising::

pre-storing an expression word map, in which a plurality of expression words expressing impressions of retrieval objects are arranged on a virtual space are arranged depending upon a degree of association of the impressions;

pre-storing a plurality of retrieval objects corresponding to said expression words;

deriving a position of at least one expression word corresponding to each said retrieval object, wherein when a plurality of expression words correspond to a retrieval object, the position is defined in the following manner:

if a distance between coordinates of said plurality of expression words is less than or equal to a predetermined distance, average coordinates of the coordinates of said plurality of expression words are taken as coordinates of the position of a single expression word corresponding to said retrieval object, and

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if the distance is greater than the predetermined

distance, respective coordinates of said plurality of expression

words are taken as the position of the at least one expression

word; and

generating a retrieval object map arranging said retrieval objects on

said virtual space on the basis of the position derived.

The Seto reference is directed to a method for retrieving image information. An

object name is inputted from a workstation to automatically retrieve the longitude and

latitude of an object by using an object table shown in Fig. 10. For example, the input

may be an airport name and the response will be either "No Object" or the longitude

and latitude of the airport name. If there is an image corresponding to the entered

object name, retrieved object information such as name, latitude, longitude area size,

etc., is displayed at the workstation. The user selects an object image, and the latitude

and longitude of the selected image are output.

An image identification number is retrieved from an image table using the

longitude and latitude of the selected image. The image table stores a sensor name,

sensed data, the latitudes and longitudes of the four corners of a sensed image, a path

name, a satellite name, an area name, and an image identification number. When the

latitude and longitude are inputted, an inclusion relationship is checked to determine

whether the inputted latitude and longitude are within the latitudes and longitudes of the

four corners of each sensed image, which thereby retrieves the image identification

number and image information. The image identification number and image

information for the latitude and longitude supplied from the object table are retrieved

and output. An object image is selected from the retrieved candidate images. The image information of the retrieved candidate images are displayed at a workstation and labeled as an intermediate output. The user selects an object image while observing the displayed information. The selected image identification number and related information are then outputted to the workstation. An area of 512 by 512 pixels is cut out, with the object image being placed at the center of the area, and is processed for display on the screen of the image display unit. (*Col. 9, line 67 - col. 11, line 35; Figs. 10, 11, 12, and 13*).

The Seto reference does not disclose, teach, or suggest the method of independent claim 40. Unlike the method of independent claim 40, the Seto reference does not concern a method for generating a retrieval object map, said method including pre-storing an expression word map, in which a plurality of expression words expressing impressions of retrieval objects are arranged on a virtual space are arranged depending upon a degree of association of the impressions; pre-storing a plurality of retrieval objects corresponding to said expression words; deriving a position of at least one expression word corresponding to each said retrieval object, wherein when a plurality of expression words correspond to a retrieval object, the position is defined in the following manner:

if a distance between coordinates of said plurality of expression words is less than or equal to a predetermined distance, average coordinates of the coordinates of said plurality of expression words are taken as coordinates of the position of a single expression word corresponding to said retrieval object, and

if the distance is greater than the predetermined distance, respective

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coordinates of said plurality of expression words are taken as the position of the

at ieast one expression word;

Instead, the Seto reference discloses that a position can be derived by using the position information, i.e., the longitude and latitude information. The Examiner states that the limitation of "deriving a position of the expression word corresponding to said retrieval object or the position of the expression word contained in said retrieval object on said virtual space", is met by the Seto reference's disclosure of a large object first being retrieved by using position information. *(October 19 Office Action, page 6)*.

This is not the same deriving a position of at least one expression word, wherein when a plurality of expression words correspond to a single retrieval object of said retrieval objects, the position is defined in the following manner:

if a distance between coordinates of said plurality of

expression words is less than or equal to a predetermined distance,

average coordinates of the coordinates of said plurality of

expression words are taken as coordinates of the position of a

single expression word corresponding to said retrieval object, and

if the distance is greater than the predetermined distance,

respective coordinates of said plurality of expression words are

taken as the position of the at least one expression word.

It is not the same because the Seto reference does not disclose that a retrieval object, i.e., the large object, can have a plurality of expression words, i.e., a plurality of latitude / longitude combinations. Further, the Seto reference does not disclose that if there were a plurality of expression words, i.e., longitude / latitude combinations, that

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the average of the plurality of the longitude / latitude combinations are utilized as coordinates for a single expression word for the retrieval object. In other words, the large object being retrieved in the Seto reference is the airport name and when the airport name is entered, a single longitude and latitude combination is presented. There is no discussion in the Seto reference of having multiple longitudes/latitude combinations being stored for each airport name. In addition, there is no discussion that any multiple longitude / latitude combinations are averaged to form a single longitude/latitude combination. Accordingly, applicant respectfully submits that independent claim 40 distinguishes over the Seto reference.

Independent claims 43, 46, 51, 56, 57, 60, 63, 67, and 74 recite similar limitations to independent claim 40. Accordingly, applicant respectfully submits that independent claims 43, 46, 51, 56, 57, 60, 63, 67, and 74 distinguish over the Seto reference for the same reasons as discussed above in regard to independent claim 40.

Dependent claims 41 - 42, 44 - 45, 47 - 50, 52 - 55, 58 - 59, 61 - 62, 64 - 66, 68 – 73, and 75 - 78 depend, indirectly or directly, from independent claims 40, 43, 46, 51, 57, 60, 63, 67, and 74, respectively. Accordingly, applicant respectfully submits that claims 41 - 42, 44 - 45, 47 - 50, 52 - 55, 58 - 59, 61 - 62, 64 - 66, 68 - 73, and 75 – 78 distinguish over the Seto reference for the same reasons as discussed above in regard to independent claims 40, 43, 46, 51, 57, 60, 63, 67, and 74.

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